

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VI TECHNOLOGIES, LLC,

Plaintiff,

v.

WOOLPERT, INC.,

Defendant.

CIVIL ACTION NO. 6:21-CV-00318-ADA

JURY TRIAL DEMANDED

JOINT MOTION TO STAY AND NOTICE OF SETTLEMENT

Plaintiff VI Technologies, LLC ("VI") and Defendants Woolpert, Inc. ("Woolpert") (collectively, the "Parties") hereby file this Joint Motion to Stay and Notice of Settlement.

VI and Woolpert have reached settlement in principle of all matter in controversy between the Parties and are in the process of finalizing the documents pertaining to the settlement. The Parties wish to conclude the settlement without burdening the Court with additional filings and without incurring unnecessary expense. The Parties anticipate they will be able to submit dismissal papers on or before March 28, 2022. Accordingly, the Parties respectfully request that the Court grant a stay of all proceedings between the Parties, including all pending deadlines between the Parties until March 28, 2022.

The Parties submit that good cause exists for granting a stay, as set forth above. The Parties' request is not for the purposes of delay, but so justice may be served. Wherefore, the Parties respectfully request that the Court enter the proposed order submitted with this joint motion and grant the Parties such order and further relief to which they are entitled.

Dated: February 28, 2022

Respectfully submitted,

By: /s/ Fred I. Williams

Fred I. Williams
Texas State Bar No. 00794855
Michael Simons
Texas State Bar No. 24008042
WILLIAMS SIMONS & LANDIS PLLC
601 Congress Ave., Suite 600
Austin, TX 78701
Tel: 512-543-1354
fwilliams@wsltrial.com
msimons@wsltrial.com

Todd E. Landis
Texas State Bar No. 24030226
WILLIAMS SIMONS & LANDIS PLLC
2633 McKinney Ave., Suite 130 #366
Dallas, TX 75204
Tel: 512-543-1357
tlandis@wsltrial.com

John Wittenzellner
Pennsylvania State Bar No. 308996
WILLIAMS SIMONS & LANDIS PLLC
1735 Market Street, Suite A #453
Philadelphia, PA 19103
Tel: 512-543-1373
johnw@wsltrial.com

Attorneys for Plaintiff VI Technologies, LLC

By: /s/ Paul Linden
John F. Bennett
Lucas V. Haugh
Paul J. Linden
ULMER & BERNE LLP
600 Vine Street, Suite 2800
Cincinnati, OH 45202
Tel: 513-698-5152
jbennett@ulmer.com
dhaugh@ulmer.com
plinden@ulmer.com

Neil J. McNabnay
Ricardo J. Bonilla
Robert A. Ehrlich
Sarika Patel
FISH & RICHARDSON P.C.

1717 Main Street, Suite 5000
Dallas, TX 75201
Tel: 214-747-5070
mcnabnay@fr.com
rbonilla@fr.com
ehlich@fr.com
patel@fr.com

Attorneys for Defendant Woolpert, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 28, 2022 the undersigned caused a copy of the foregoing document to be served on all counsel of record, via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

/s/ Fred I. Williams
Fred I. Williams

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for VI Technologies, LLC. and counsel for Woolpert met and conferred, and all parties agree to filing the foregoing document as a joint motion.

/s/ Fred I. Williams
Fred I. Williams